

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DeCOTIIS, FITZPATRICK, COLE & GIBLIN, LLP

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Attorneys for Plaintiff Megan Schaffer

MEGAN SCHAFFER,

Plaintiff,

v.

BOROUGH OF PARAMUS; KEN RASCHEN in his individual and official capacity; JOSEPH "JAY" SEXTON in his individual and official capacity; ROBERT KAISER, in his individual and official capacity; ACE ANTONIO, in his individual and official capacity; JEANNE WEBER, in her individual and official capacity; WILLIAM R. COMERY, in his individual and official capacity; HECTOR OLMO, in his individual and official capacity; JOHN DOES 1-10;

Defendants.

Hon. Brian R. Martinotti, D.J.
Hon. Michael A. Hammer, M.J.

DOCKET NO. 2:23-cv-00530-BRM-MAH

**NOTICE OF MOTION TO AMEND
COMPLAINT AND TO REMAND**

Return Date: August 7, 2023

PLEASE TAKE NOTICE that on August 7, 2023 at 9:00 a.m., or as soon thereafter as counsel may be heard, plaintiff Megan Schaffer, by and through their undersigned counsel, shall move before the above-named court for leave to file an

Amended Complaint pursuant to Fed. R. Civ. P. 15 and L. Civ. R. 15.1, and for the entry of an Order remanding the Amended Complaint to the New Jersey Superior Court, Law Division, pursuant to 28 U.S.C. § 1447 (c);

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs shall rely upon the enclosed brief and certification (with attached exhibits) submitted therewith;

PLEASE TAKE FURTHER NOTICE that the proposed Amended Complaint and a proposed form of Order are also submitted herewith;

PLEASE TAKE FURTHER NOTICE that pursuant to L.Civ.R. 78.1(b), oral argument is hereby requested.

Dated: July 14, 2023

/s/ Gregory J. Hazley _____
Gregory J. Hazley, Esq.
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